

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-MDL-1570 (GBD)(SN) ECF Case
This document relates to:  <i>Amin et al v. Islamic Republic of Iran</i> , No. 20-cv-00412 <i>Anderson et al v. Islamic Republic of Iran</i> , No. 20-cv-00354	

**DECLARATION OF BARRY SALZMAN IN SUPPORT OF  
THE *AMIN* AND *ANDERSON* PLAINTIFFS’  
RENEWED MOTION FOR PARTIAL FINAL JUDGMENTS**

Barry Salzman, Esq., hereby states under penalty of perjury as follows:

1. I am an attorney representing the Plaintiffs in the above-captioned matters (the “*Amin* and *Anderson* Plaintiffs”), in the above-captioned multidistrict litigation.
2. I submit this declaration in support of the present motion for entry of partial final judgments against the Islamic Republic of Iran (“Iran”) on behalf of the three *Amin* and *Anderson* Plaintiffs listed in the table at Exhibit B (the “Re-filing Decedents”) to the simultaneously filed “[Proposed] Partial Final Default Judgment for the *Amin* and *Anderson* Plaintiffs Identified at Exhibit B” (the “Proposed Judgment”) conforming with the Court’s previous orders.
3. The form of the present motion and the relief requested therein are intended to comply with, *inter alia*, the following orders of this Court:
  - a. The Court’s order dated January 24, 2017 (ECF No. 3435), requiring that “[a]ll further motions for final judgment against any defaulting defendant shall be accompanied by a sworn declaration attesting that the attorney has complied with the due diligence safeguards [referenced in Section II.D. of the January 23, 2017 letter from the Plaintiffs’ Executive Committee (ECF No. 3433)] and (2) personally verified that no relief has previously been awarded to any plaintiff included in the judgment (or, if relief has been awarded, the nature of that relief).” For compliance with the required sworn declaration, please see below.

- b. The Court's Order dated October 28, 2019 (ECF No. 5234) setting forth updated procedural rules.
- c. The Court's Order dated November 14, 2023 (ECF No. 9435) setting forth the requirement that motions for default judgment be accompanied by a standardized cover sheet, exhibits, and checklist.

4. The source of information and the basis for my belief in the statements contained herein are my personal involvement in this matter, my firm's representation of the *Amin* and *Anderson* Plaintiffs, including the Re-Filing Decedents, in connection with the September 11 terrorist attacks, my work in connection with the September 11 terrorist attacks, communications with the family members of the individuals killed as a result of the September 11 terrorist attacks, court records relating to the *In re Terrorist Attack on September 11, 2001* multidistrict litigation to which the *Amin* and *Anderson* Plaintiffs are parties, my communications with other counsel for other plaintiffs in the *In re Terrorist Attack on September 11, 2001* multidistrict litigation, and documents and records relating to the *In re Terrorist Attack on September 11, 2001* multidistrict litigation. Any matters about which I lack personal knowledge are asserted herein upon information and belief.

5. I have been retained by the *Amin* and *Anderson* Plaintiffs individually to pursue recovery for each of their wrongful death damages and solatium injuries arising out of the September 11 terrorist attacks.

6. As stated in my previous declarations filed on August 16, 2022 (ECF Nos. 8356, 8375):

- a. I have verified that each of the Re-Filing Decedents was injured and ultimately died as a result of the September 11 terrorist attacks.
- b. I submitted true and correct copies of documents establishing that the death of each of the Re-Filing Decedents was caused by the September 11 terrorist attacks.
- c. I have verified that each of the Re-Filing Decedents was a United States citizen as of September 11, 2001.

7. Further, for each of the Re-Filing Decedents, the new personal representative has confirmed that, following the death of the prior personal representative of the estate of the Re-Filing Decedent, he or she was appointed by the relevant court as the new personal representative of the estate.

8. I have complied with the due diligence safeguards referenced in Section II.D of the January 23, 2017 letter from the Plaintiffs' Executive Committees (ECF No. 3433) referenced in the Court's order of January 24, 2017 (ECF No. 3435) by verifying with information provided by the Plaintiffs' Executive Committee that the Re-Filing Decedents have not sought nor been awarded any of the damages requested in the present motion for entry of partial final judgments, nor do any of them have a pending motion before this Court for compensation arising out of the September 11 terrorist attacks.

9. I have also complied with the Court's order of November 14, 2023 (ECF No. 9435) by completing the standardized cover sheet, standardized exhibit table, and checklist; submitting the cover sheet as Exhibit A and the exhibit table as Exhibit B to the Proposed Order filed in connection with this motion; and, following the filing of the motion, the Excel file of the standardized exhibit table will be emailed as instructed in the checklist.

10. Exhibit B to the Proposed Order sets forth damages in the amount of Magistrate Judge Netburn's initial recommendation of \$7,000,000 for each Re-Filing Decedent, consistent with the judgment figures this court has previously determined appropriate for compensatory damages for pain and suffering for individuals injured in the September 11 attacks. *See* R. & R., March 3, 2023, ECF No. 8901 at 2, *adopted* Mem. Decision and Order, Aug. 9, 2023, ECF No. 9274; *see also* R. & R. 9, July 30, 2012, ECF No. 2618; Order of Further Partial Judgment, June 16, 2016, ECF No. 3300; R. & R. 7-8, Oct. 12, 2016, ECF No. 3358; Order of Partial Final Default

Judgments, July 31, 2017, ECF No. 3666; R. & R. 6, Feb. 7, 2020, ECF No. 5879, *adopted by* Mem. Decision and Order, Feb. 14, 2020, ECF No. 5946; R. & R. 6, Feb. 7, 2020, ECF No. 5888, *adopted by* Mem. Decision and Order, Feb. 14, 2020, ECF No. 5984.

11. Accordingly, I respectfully request that this Court grant the *Amin* and *Anderson* Plaintiffs' present motion for entry of partial final judgments against Iran, enter the simultaneously filed Proposed Judgment, and award damages in the amounts listed in Exhibit B of the simultaneously filed Proposed Order.

Dated: June 24, 2024

/s/ Barry Salzman  
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